

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE: :
:
HOSPITAL DAMAS : CASE NO. 10-8844 (MCF)
Debtor :
: CHAPTER 11
:
_____:

URGENT MOTION FOR EXPEDITED HEARING
ON MOTION TO LIFT AUTOMATIC STAY FOR JURY TRIAL SCHEDULED IN 20
DAYS BEFORE THE U.S.DISTRICT COURT FOR PUERTO RICO

To the Honorable Court:

1. On March 11, 2009, Olga Maldonado and her son Josued Narvaez Maldonado represented by attorney Rafael E. García Rodón (collectively, "Movants"), filed a suit against codefendant Hospital Damas in the United States District Court for the District of Puerto Rico, Civil Action No. 09-1240 (CCC), before the Honorable Judge Carmen Consuelo Cerezo alleging medical malpractice that arise under the laws of the Commonwealth of Puerto Rico, Articles 1802 and 1803 of the Civil Code of Puerto Rico.

2. On September 2, 2010, the District Court scheduled a jury trial for October 20, 2010 at 10:00 A.M., which involves two other codefendants, Dr. Jorge Guzman Villalonga and his Conjugal Partnership, and Dr. Jesus Monasterio and his Conjugal

Partnership, the expert witnesses, the debtor and the Movants; all parties which are ready and summoned for the Trial.

3. On September 26, 2010, the debtor filed for bankruptcy.

4. Movants hereby move the Court to shorten the period for debtor to reply to the "Motion for Lift of Automatic Stay" filed today pursuant to 11 U.S.C. §362(d)(1), in order for the Court to schedule an expedited hearing on the merits of such motion, before October 20th, 2010, so that the jury trial should continue as scheduled.

5. The order lifting the automatic stay is for the limited purpose of allowing the United States District Court of Puerto Rico to hear the jury trial scheduled for October 20, 2010, at 10:00 AM, thereby liquidating the medical malpractice claim of the Movants.

WHEREFORE, the Movants respectfully move the Court to shorten the period for debtor to reply to the "Motion for Lift of Automatic Stay" filed today by the Movants, and for the Court to schedule an expedited hearing on the merits of such motion before October 20th, 2010, so that the jury trial should continue as scheduled.

CERTIFICATE OF SERVICE

I hereby certified that today, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System

which will send notification of such filing to all parties in interest.

Dated: September 30, 2010.

Respectfully submitted,

/s/ Rafael E. Garcia Rondon

RAFAEL E. GARCIA RODON

USDC-PR 129911

Attorneys for the plaintiff

Banco Popular De Puerto Rico

206 Tetuan Street

7th Floor, Suite 701

San Juan, Puerto Rico 00901

Phone: (787) 722-7788

Fax: (787) 722-7748

Email : rgrlaw@gmail.com

/s/ Gerardo A. Carlo-Altieri

GERARDO A. CARLO-ALTIERI

USDC-PR 112009

Attorneys for the plaintiff

San Jose St. #254

5th Floor,

San Juan, Puerto Rico 00901

Phone: (787) 520-6002

Fax: (787) 520-6003

Email : gaclegal@gmail.com

/s/ Maria Soledad Lozada Figueroa

MARIA SOLEDAD LOZADA FIGUEROA

USDC-PR 222811

Attorneys for the plaintiff

San Jose St. #254

3rd Floor,

San Juan, Puerto Rico 00901

Phone: (787) 520-6002

Fax: (787) 520-6003

Email : lcdamslozada@gmail.com